

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

DARRELL YOUNGERS

DEFENDANT.

CASE NO. 21-mj-00505 (ZMF)

MOTION FOR RETURN OF SURETY DOCUMENTS

**TO THE HONORABLE ZIA M. FARUQUI,
UNITED STATES MAGISTRATE JUDGE
FOR THE DISTRICT OF COLUMBIA:**

COMES NOW co-defendant **Darrell Youngers**, through the undersigned counsel, who, very respectfully, **STATES** and **PRAYS** as follows:

1. On July 6th, 2021, this Honorable Court issued defendant's conditions of release in this case.
2. Particularly, the conditions of release do not require that Mr. Youngers surrender his passport to the United States Probation Officer or prohibit defendant from traveling. *See DE 12, condition 7(a),(f),(t).*
3. Mr. Youngers surrendered his passport upon arrest to the U.S. Probation Office of the Southern District of Texas.
4. However, since this Honorable Court did not impose passport surrender as a condition of release, the undersigned respectfully pleads

that this Honorable Court order the U.S. Probation Office for the Southern District of Texas to release Mr. Youngers' passport to him.

5. As previously mentioned, there is no reason to continue holding the passport he surrendered as part of his conditions of pretrial release that were imposed as surety for his Court appearances, since those conditions are not part of his release order.

6. Mr. Youngers' passport is in the possession of the U.S. Probation Office and will continue in its control until this Honorable Court issues an Order otherwise.

WHEREFORE, it is hereby respectfully requested that this Honorable Court take notice of the above and returns the documents surrendered as surety by Mr. Youngers to complete his pretrial release conditions.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed an exact copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record, or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

RESPECTFULLY SUBMITTED.

At Houston, Texas, this 16th day of September, 2021.

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